

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A BRAZOS LICENSING AND DEVELOPMENT, Plaintiff, v. DELL TECHNOLOGIES INC., DELL INC., AND EMC CORPORATION, Defendants.	CIVIL ACTION 6:20-CV-00473-ADA CIVIL ACTION 6:20-CV-00475-ADA CIVIL ACTION 6:20-CV-00476-ADA CIVIL ACTION 6:20-CV-00477-ADA CIVIL ACTION 6:20-CV-00482-ADA PATENT CASE JURY TRIAL DEMANDED
WSOU INVESTMENTS, LLC D/B/A BRAZOS LICENSING AND DEVELOPMENT, Plaintiff, v. DELL TECHNOLOGIES INC., DELL INC., EMC CORPORATION, AND VMWARE, INC., Defendants.	CIVIL ACTION 6:20-CV-00480-ADA CIVIL ACTION 6:20-CV-00481-ADA CIVIL ACTION 6:20-CV-00485-ADA CIVIL ACTION 6:20-CV-00486-ADA PATENT CASE JURY TRIAL DEMANDED

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“WSOU”) and Defendants Dell Technologies Inc., Dell Inc., EMC Corporation, and VMware, Inc. (collectively, “Defendants”), (collectively, the “Parties”), respectfully submit this Stipulated Protective Order, which is attached hereto at Exhibit 1.

Dated: January 27, 2022

By: /s/ Jonathan K. Waldrop

Jonathan K. Waldrop (CA Bar No. 297903)
(Admitted in this District)
jwaldrop@kasowitz.com
Darcy L. Jones (CA Bar No. 309474)
(Admitted in this District)
djones@kasowitz.com
Marcus A. Barber (CA Bar No. 307361)
(Admitted in this District)
mbarber@kasowitz.com
John W. Downing (CA Bar No. 252850)
(Admitted in this District)
jdowning@kasowitz.com
Heather S. Kim (CA Bar No. 277686)
(Admitted in this District)
hkim@kasowitz.com
ThucMinh Nguyen (CA Bar No. 304382)
Admitted in this District
tngueyn@kasowitz.com
KASOWITZ BENSON TORRES LLP
333 Twin Dolphin Drive, Suite 200
Redwood Shores, California 94065
Telephone: (650) 453-5170
Facsimile: (650) 453-5171

Hershy Stern (NY Bar No. 4631024)
hstern@kasowitz.com
(*Pro hac vice* admission)
Joshua A. Whitehill (NY Bar No. 4766473)
jwhitehill@kasowitz.com
(*Pro hac vice* admission)
Bradley P. Lerman (NY Bar No. 4906079)
blerman@kasowitz.com
(*Pro hac vice* admission)
Howard L. Bressler (NY Bar No. 2487379)
hbressler@kasowitz.com
(*Pro hac vice* admission)
Jayita Guhaniyogi (NY Bar No. 5349022)
jguhaniyogi@kasowitz.com
(*Pro hac vice* admission)
Julianne Laporte (NY Bar No. 5547906)
jlaporte@kasowitz.com
(*Pro hac vice* admission)
Shelley Ivan (NY Bar No. 4338067)
sivan@kasowitz.com
(*Pro hac vice* admission)
KASOWITZ BENSON TORRES LLP
1633 Broadway
New York, NY 10019

By: /s/ Barry Shelton

Barry K. Shelton
Texas State Bar No. 24055029
bshelton@winston.com
WINSTON & STRAWN LLP
2121 N. Pearl Street
Suite 900
Dallas, TX 75201
Phone: +1 214-453-6500
Fax: +1 214-453-6400

Benjamin Hershkowitz
bhershkowitz@gibsondunn.com
Brian A. Rosenthal
brosenthal@gibsondunn.com
Allen Kathir
akathir@gibsondunn.com
Kyanna Sabanoglu
ksabanoglu@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
200 Park Ave.
New York, NY 10166-0193
Telephone: 212.351.4000
Facsimile: 212.351.4035

Y. Ernest Hsin
ehsin@gibsondunn.com
Jaysen S. Chung
jschung@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
555 Mission St., Ste. 3000
San Francisco, CA 94105-0921
Telephone: 415.393.8200
Facsimile: 415.393.8306

Ryan K. Iwahashi
riwahashi@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
1881 Page Mill Rd.
Palo Alto, CA 94304-1211
Telephone: 650.849.5300
Facsimile: 650.849.5333

Telephone: (212) 506-1700
Facsimile: (212) 506-1800

Paul G. Williams (GA Bar No. 764925)
pwilliams@kasowitz.com
KASOWITZ BENSON TORRES LLP
1230 Peachtree Street, NE, Suite 2445
Atlanta, GA 30309
Telephone: (404) 260-6080
Facsimile: (404) 393-9752

Andrew P. Blythe
ablythe@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
3161 Michelson Drive
Irvine, CA 92612-4412
Telephone: 949.451.3800
Facsimile: 949.451.4220

Attorneys for Defendants

Mark D. Siegmund (TX Bar No. 24117055)
mark@swclaw.com
Craig D. Cherry (TX Bar No. 24012419)
craig@swclaw.com
Justin Wayne Allen (TX Bar No. 24081977)
justin@swclaw.com
**STECKLER WAYNE COCHRAN
CHERRY, PLLC**
8416 Old McGregor Rd.
Waco, TX 76712
Telephone: (254) 651-3690
Facsimile: (254) 651-3689

ATTORNEYS FOR PLAINTIFF
WSOU INVESTMENTS, LLC
d/b/a BRAZOS LICENSING AND
DEVELOPMENT

CERTIFICATE OF SERVICE

The undersigned certifies that on January 27, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a).

/s/ Barry K. Shelton
Barry K. Shelton